Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)
Revitalization of the AM Radio Service)
MB Docket No. 13-249)
)
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INTRODUCTION AND STATEMENT

I personally listen to radio at home and in my car. I do not have XM/Sirius, MP3 players, listen "on the web", or subscribe to "radio like" services on my smartphone. I value AM Radio not only as an entertainment media and revenue source for business, but a vital tool for public service and safety.

I am employed as the Vice President and Chief Operator of a group of television stations¹, and Director of Engineering for a television media company² with stations throughout the United States. I started working in radio in April 1968. In 1985 I transitioned to television. However, I still have interests in AM radio through business acquaintances and personal friends. I also publish an audio magazine³ for the blind and physically handicapped which supports and encourages radio listening in North America.

My background in radio included Operations Manager of an AM/FM combo, DJ at several radio stations, Program Director, and Chief Engineer. I have worked in small markets, and large markets⁴.

I am co-chairman of the Lima/Allen County (OH) EAS district. I volunteer with the Allen County Office of Homeland Security as a Communications Deputy. I contributed in public service as past president of the Lima Host Lions Club, which devotes its self to saving sight and assisting the handicapped. I'm a licensed radio amateur⁵. I perform public service during times of emergency. I am trustee of four amateur radio repeaters⁶ which are open, publically used, and designed to render service in times of public necessity.

AM radio has the ability to cover vast distances, which is important in times of public emergencies. As demonstrated during events such as the Great Ice Storm of 1998⁶, our local Ice Storm of 2005⁷, the 2012 Derecho Event⁸, Hurricanes Sandy and Katrina. Each time AM Radio played a pivotal role in public safety before, during, and after the events. Where many commercial services failed, radio succeeded.

The damage and loss of public utilities during the ice storms and Derecho was so severe some local radio stations were unable to serve. Some corporately owned FM stations continued on with 12-in-a-row music, automated, devoid of public service. Our area residents sought the distant AM signals of stations for news and information. AM radio in particular provided the lifeline of information in public need.

Travelers depend on AM radio for information on weather and events as they drive toward their destination. Americans are a mobile society. It's rare not to find a radio receiver in any automotive product sold in the United States in the past four decades. Ninety-two percent⁹ of Americans listen to radio, and a significant number of people listen to AM Radio.

¹ Lima Communications Corporation, & West Central Ohio Broadcasting (Lima OH).

² Block Communications Inc. (Toledo, OH).

³ DX Audio Service, National Radio Club Inc. Published consecutively since April 1985.

⁴ Detroit MI 1980-1985 WHND-AM & WMJC-FM

⁵ W8HDU. General Class – Trustee for KT8APR & W8AOH

⁶ The North American Ice Storm of 1998, AKA: "Great Ice Storm of 1998", was a massive combination of five smaller successive ice storms which combined to strike a relatively narrow swath of land from eastern Ontario to southern Quebec to Nova Scotia in Canada, and bordering areas from northern New York to central Maine in the United States.

⁷ Lima, Ohio, January 5/6, 2005. Widespread power outages of up to 3-weeks, silencing local radio, television, and cable service. Damage in many counties topped \$1 million with a couple counties exceeding \$10 million in losses. Richland County (OH) alone, clean-up cost accrued by local governments totaled nearly \$6 million.

⁸ June 29, 2012 Derecho. Wind gusts increased substantially, peaking as high as 91 mph (147 km/h) in Fort Wayne, equivalent to a Category 1 hurricane, and in Allen County (OH) winds were clocked at 82 mph (128 km/h).

⁹ Based on numbers supplied by Arbitron, a reputable rating service tracking listener information.

Radio is important to many in rural communities. Since many FMs have migrated to larger cities, AM radio serves a purpose to rural America. AM radio can be a lifeline to senior citizens, the blind, and the handicapped. AM radio provides a service which cannot be duplicated with other services.

The Federal Communications Commission would do a great disservice to the people of The United States by ignoring the concerns of normal citizens, like myself, who desire better AM radio service. While I have no personal business interest in AM radio, I use AM on a daily basis, and so do my neighbors.

AM Radio is relevant. AM Radio is vital. AM Radio needs the Commission's attention and guidance.

CONCERNS IN MB Docket No. 13-249

Relax the AM daytime community coverage rule

The community coverage rule should be carefully analyzed to weigh public good and merits of commerce, while protecting the investments of other licensees.

The original intent of the F.C.C. rule was is to insure a station's coverage was as complete as possible over the city of license. Due to widening population centers this may not be possible in all cases.

The Commission should not refuse to license a facility simply because it fails to maintain a specified signal level over a percentage of population; no more than the F.C.C. should rescind a station license because the population mass grew away from the original signal contour.

The Commission should embrace new antenna designs as long as a licensee can reasonably provide coverage to a community without causing interference to other licensees.

The Commission should grant Construction Permits for new antenna designs based on the following criteria. 1). The design will be experimental, and subject to a 1 year construction permit. 2). The applicant must prove satisfactory coverage to a designated area. 3). The applicant must prove they are able to protect other licensees from interference. 4). Upon licensing the facility, the applicant agree to make field measurement annually, for a term of three years, to prove the design is stable and suppressing interference to other licensees. 5). The station must provide local public service.

The Commission should grant more flexibility to a licensee based on the ability to provide public service to a specified geographic area, and not just to cast out a larger signal of which programming is duplicated or serves no public necessity.

Opening a one-time FM translator filing window

The FM band should not be used simply as a way to fill in AMs. I believe a more prudent way would be to deploy low power synchronous AM transmitters to fill in dead areas.

I am concerned over recent abuses of FM translators. Some licensees use their AM or FM's digital sidechannels as a method to feed an FM translator with a different service. I doubt the Commission had this utilization in mind when granting use of FM translators.

Other licensees have used FM translators to increase coverage in adjacent service areas while ignoring coverage in within the AM station's licensed profile. This also defeats the intent of translators.

Look at how many FM translators are deployed taking signals from hundreds or thousands of miles away, serving no local need, or community service. This was not the intent of FM translator service.

If FM translators are used, a grant of an FM translator should be made with the condition; 1). The placement of the translator resolves a signal reception problem within the AM station's 1 mv/m coverage. 2). The programming on the translator must be 100% the primary AM station's analog channel and not a sub/side channel carried in digital. 3). The licensee of the AM station will guarantee the translator will provide local public service and emergency information to the area covered by the FM translator.

I am concerned about the availability of open channels in most communities for FM translators. Unless the Commission starts to purge translators carrying no local programming, or reclaim translators presently silent, there are not a sufficient number channels available for each AM station requesting a translator. How will the Commission determine who is worthy of a translator?

Relaxing the AM nighttime community coverage standards

This subject is a double edged sword. Many AM stations have experienced community growth outside of their service contour. Others are now impacted by massive interference which historically has not been seen since the first days of radio. Moving population centers, adjacent channel interference, local electrical noise, and poorly made receivers, have all caused a station's nighttime service to dwindle.

Some may think relaxing interference contours is the answer. If the nighttime contour can't serve the community of license at 1 kilowatt, then allow the station to increase power until the population contour is covered is really a poor idea. Relaxing standards for nighttime interference is like sitting in your backyard listening to your radio when your neighbor starts listening to their radio and turns up their radio's volume. Your only choice is to turn your radio up. Then another neighbor turns up their volume so they can hear their radio. At some point you reach a level of noise pollution where none of the neighbors can enjoy the program they want all due to interference from others.

The Commission may have forgotten what happened when it granted AM stations on Local Channels¹⁰ an increase of power to "overcome" interference. The intent was to allow many of the 100, and 250

 $^{^{10}}$ Local channels: 1230, 1240, 1340, 1400, 1450, 1490. A Class D station operates either daytime, limited time, or unlimited time with a nighttime power less than 0.250 kW and an equivalent RMS antenna field less than 141 mV/m at 1 km for the actual power.

watt nighttime stations to conquer co-channel interference. It did not help with interference. It actually decreasing many station's coverage because their neighbors all contributed to added interference by raising power as well. As a side note, this also contributed to interference on adjacent channels. Today we find many Local Channel stations have a reduced 4 to 7 mile radius of acceptable coverage. Although lower power, (before the historic increase was granted), these stations had better coverage due to the lack of interference.

On the other hand; the Commission has to question if a station licensed to a community which has overgrown the station's service contour, is serving in the public good. Perhaps this is where the Commission should look at the available technology of low power AM synchronous transmitters to fill in specific areas, a new design of antenna, or giving licensees the flexibility to move transmission sites to better locations.

The Commission should always ask the vital question; "is the public good being served by allowing additional signal coverage, or can the station still provide a service to the community with reduced nighttime coverage."

Eliminating the AM "ratchet rule"

The Commission should reconsider this option. As pointed out earlier, lessening protection standards often leads to unintended consequences. AM radio has two methods in which a listener can hear a station; ground wave, and skywave.

Skywave is still of importance to many listeners, particularly those in rural areas and to those who are mobile. However, skywave also affects stations hundreds or thousands of miles away can reduce the ability to serve the public, as well as the profitability of a station.

By allowing more interference to distant stations the Commission places in danger those citizens who depend on both local and skywave service. Increased interference from other stations would not serve the public good.

The litmus test for increased nighttime coverage should not be "is it possible" or "can we engineer it". It should be; "what public services would the station serve by casting out a larger signal, and would the increase in coverage have a negative effect on other licensees."

Permitting wider implementation of MDCL

The implementation of MDCL does not impact the revitalization of AM Radio.

A station using MDCL does not provide better or more public service. MDCL seems to accomplish a lower electrical bill for the licensee, essentially cost cutting for a licensee.

I feel all technical advancements should be explored and implemented as long as it does not contribute to interference, lessen public service, nor cause the public to abandon legacy receivers in place of proprietary modulation schemes. Any advancement in technology should be embraced.

Modifying AM antenna efficiency standards

The Commission should ask the question; what public good does it serve to maintain a minimum standard of AM antenna efficiency. In some cases it could be argued that the efficiency contributes to field strengths which are needed. Case in point, a large metropolitan area, such as markets 1 to 250.

But the Commission should also ask; if a station is licensed to serve a small community, with a small service contour, using an inefficient antenna, what harm does it do in the scope of public service?

I would argue if a licensee desired to serve a 3 mile radius with a short radiator which was highly inefficient, and the licensee does not cause interference to other licensed facilities, then what concern is it to the Commission to deny a license on technical merit? Is not local public service more important?

Likewise, there are situations where the licensee may not be able to satisfy the efficiency standards based upon NIMBY, height restrictions, or ground system implementation.

This is an area which the Commission should be flexible as long as the licensee can satisfy the Commission's interference standards to other licensees..

One has to look no further than the T.I.S. Service, in which a poorly radiated signal serves in the public good.

RECEPTION ISSUES

Noise in the Environment

One thing has bothered me for years. Why does the Commission enforce the prohibition of hobby transmitters in the AM band exceeding 24000/f(khz)¹¹ at 30 meters, when man-made noise often exceeds 1 mv/m at a distance of 100 meters or more?

While mobile in my community, my vehicle's receiver is constantly impacted by noise. This noise emanates from power lines, LED lighting devices, traffic signals, televisions, billboards, and many other electrical devices. In some cases this noise persists for a mile or more, and will overcome a local AM station.

More disturbing is the fact that manmade noise impacts not only the <u>whole</u> AM band but other spectrum. I have noted noise in the amateur radio bands, VHF & UHF public service, television broadcast band, and at times I've heard FM broadcast stations impacted by noise.

In Las Vegas¹² they have been fighting to clean up the frequencies of 437 to 442 megahertz caused by LED lighting systems. Individually the bulbs are not big radiators, but when clustered they cause havoc.

¹¹ FCC 47CFR15.209 "Except as provided elsewhere in this subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table of Part 15, subparagraph 209.

The noise is not limited to Lima, Ohio, and Las Vegas, Nevada. The noise is in every major city in North America. Only when you drive out into rural America do you seem to receive relief from noise.

While driving in large metropolitan cities the whole AM band is contaminated with buzzes, rogue carriers, and white noise, rendering only high power stations usable for reception.

While parked in front of a Kohls store, I noted a "beeping" over my local AM radio station. As I tuned the dial the "beep" encompassed the entire radio band. It was later determined the store had a defective anti-theft device, which radiated one-hundred-ninety-three feet away, interfering with a 1,000 watt AM station on 1150 kilohertz¹³, 4.92 miles from where I parked. This interference was also documented in several amateur radio publications in another communities causing interference to HF communications. The store fixed the problem, but this is just one example.

While on the road it's not unusual to have my AM radio reception wiped out when I pull up to a fast food restaurant drive through window. The worst case was a restaurant which wiped out a 50,000 watt radio station 6 miles from the transmitter, all FM broadcasts, and my 145-147 MHz amateur radio reception. And since the public service band is just above amateur radio, consider first responders may not be able to hear a call. Since many are digital, they would have no clue reception is being blocked.

There is an irony to this. The Commission's Enforcement Bureau just concluded a long, and lengthy investigation concerning low power RF devices manufactured by Rane Corporation.¹⁴ This action ended with Rane paying \$61,500, (while admitting no guilt), in the matter of unlicensed RF devices. There are two interesting points to make.

First, the Rane devices posed very little field strength to cause interference to licensed devices, or users.

Second, the interference I have experienced which affects AM broadcast, amateur, international shortwave, and public service, has *NEVER* been addressed by the Commission. Is this not a double standard? Should not the Commission hold all radiating devices to the same technical merit?

The Commission should hold all devices and sources of radiated signals to the same field strength limits as defined in CFR 47, Part 15. The Commission should actively enforce compliance.

I would suggest the Commission institute a minimum two year cleanup of AM spectrum to reign in devices exceeding radiation limits. Owners of devices should be required to conform with signal strength limits or disable the devices. The Commission should not waiver any interference.

Based on the Rane Corporation matter, and those involving pirate radio activities over the past five years, we have case law and well as a benchmark to levy fines against offenders of freely radiating devices, and the F.C.C. needs to start enforcing the law. The bottom line: Eliminate the interference.

¹³ WIMA 1150KHz 1kw Day Tower Electrical Height: 107 Degrees (77.48 meters), RMS Theoretical: 317.04 mV/meter.

¹² In the matter of Amendment of Parts 0,1,2, and 15 of the Commission's Rules Regarding Authorization of Radiofrequency Equipment, ET Docket No. 13-44, RM-11652 filed by Cohen, Dippell and Everist, P.C.

¹⁴ Rane v. F.C.C. - File No.: EB-SED-12-000051921, DA 13-2047 – Link to F.C.C. order, released December 23, 2013 http://www.fcc.gov/document/rane-settles-equipment-marketing-probe-61500-and-compliance-plan

Noise caused by Broadcasters

The issue of noise caused by broadcasters was skillfully legislated as being legal, rather than taken for face value. I have doubts any Commissioner has tried to listen to an out of town station affect by in band on channel transmissions, (in band adjacent channel migration).

To non-technical listeners they assume, (wrongly), the station they wish to listen to is weak, when in reality it's being impacted by digital carriers from a co-channel, or adjacent channel broadcaster.

I listening to WJR in Detroit MI, which before in band on channel was implemented was no problem to hear. But since WSB in Atlanta GA, and WABC in New York NY began their in band on channel transmissions, the signal of WJR has been compromised. All three of these stations are 50,000 watt stations with impressive signal strength into Lima, Ohio. My radio receiver is unable to distinguish between the analog information from WJR and the digital sidebands on each side of WJR's signal. I'm at a loss how anyone can not understand this fact, and how it was rationalized to be acceptable.

Recently our area was hit by a massive snow storm with high winds. As the storm moved east I was concerned about my daughter living 50 miles north of New York. I could not hear any of the 1A/1B clear channel stations due to digital migration.

While trying to listen to KDKA-1020, WBZ-1030's digital made it impossible to receive a clear signal.

In some cases, due to variances in skywave vs groundwave, a station interferes with its self. WTAM-1100's signal was unusable due to its digital carriers affecting the analog signal as the ionosphere changed within the gray zone of coverage. While slight phasing can be curious to the ear, the rushing sound of noise typically makes any station unintelligible.

All these stations were clear and easy to receive many years ago. I have a hard time understanding why have we decided in the quest for digital, interference is acceptable. While the intent was noble to provide hybrid transmissions, history has proven this effort to cause more harm than good. Certainly, like AM Stereo, in band on channel digital transmissions has not improved AM radio, provided public service, nor made radio more profitable. It has, however, diminished the technical quality of AM Radio.

I propose opening television channels 3 and 4¹⁵ exclusively for digital AM companion channels. Channels 5 and 6¹⁶ could be used for digital FM companion channels. Such an action would have to be coordinated with Mexico and Canada, but mathematically all United States AM radio stations could have a companion digital transmitter in their market with channels 3 and 4.

With a receiver capable of decoding analog AM and FM, plus 24 MHz of digital companion channels, the public would not be harmed by unintentional interference from digital sources, and the marketplace, (citizens who buy the new receivers), would decide when to abandon legacy analog services. The government, nor a proprietary manufacture would be responsible for displacing millions of radio receivers nor ruining the listening experience for the public.

The Commission should fast-track channels 3 and 4 for digital radio use <u>before</u> it intends to repack the television band.

 $^{^{15}}$ 60.000 MHz to 72.000 MHz. (12 MHz of spectrum).

¹⁶ 76.000 MHz to 88.000 MHz, (12 MHz of spectrum).

Optionally, if the Commission desires to keep low band VHF, perhaps when the television band is repacked, the Commission could reserve four channels at the top end of the UHF television spectrum exclusively for digital radio. For example, channels 31 to 34.

The Commission should realize that it, by allowing in band on channel digital transmissions in the AM band, has not only enabled, but has harmed the very stations it's now trying to help. We tried in band, and it has not worked. It's time to move on. Let's eliminate it, move digital out of the analog spectrum of AM radio, and allow the public to listen with their legacy receivers.

Inferior Receivers

Although the United States has some of the best technology minds, we have the most inferior radio products on the market which affects the public's ability to listen to radio.

I'm reminded when I traded in my old car for a new car¹⁷ in 1981. Although the in-dash radio was somewhat equal in sensitivity and selectivity, the frequency response was limited from the 1972 model. I was listening to the same stations, driving the same roads, and the stations made no adjustments on their transmissions. I talked to the engineering department of the company manufacturing the vehicle and was told the high frequency audio response was "dampened" due to noise from the ignition system.

In 1995 I was asked to help the General Manager of a station who purchased a brand new vehicle 18 and found his 10,000 watt AM station started to fade away 18 miles from his transmitter. The frequency response dropped off as signal diminished. Subsequent tests showed not only the effect described in 1981, but also a significant loss of sensitivity on the receiver. Again, why are these devices so poor?

Two different manufacturers, two different auto companies, with two very unhappy customers wanting to listen to quality AM radio in their car. To resolve the problem we removed the stock radios from the vehicles and replace them with 3rd party radios¹⁹ purchased from companies in Europe. Problem solved.

Since FM or satellite receivers seem to be manufactured to higher specifications, the public perception is AM transmissions are flawed, when in reality the manufacturer has crippled the radio in order to eliminate noise caused within their product.

The United States has the ability, and the technology to design and manufacture good AM radios. What we lack is the will. We lack concern to care about a public asset such as AM radio. If Europe can make good quality AM mobile reception devices, we should be able to.

The Commission should enact a receiver standard mandating all mobile receivers be capable of receiving the full AM transmitted signal. Such a standard should encompass frequency response, and noise rejection. At no time should a receiver have preference toward one or more bands at the expense of another. Mobile receivers should not be incapable of receiving AM transmissions, (as some are). The reason, (mainly public service), is consistent with the many times the nation has relied on AM stations in mobile situations. Those of us who drive in rural America need to receive good radio signals.

 $^{^{17}}$ 1981 Ford Fairmont with Philco standard AM/FM in dash radio.

¹⁸ 1995 Buick Riviera with stock GM in dash radio.

¹⁹ Manufacturers such as Blaupunkt, Sony, and Pioneer sold radios which were superior to in-dash models being sold with vehicles, and did not exhibit the sensitivity, selectivity, and diminished audio bandwitch.

Non-Technical Issues

AM radio doesn't have a technical flaw. AM radio has a content problem in many cases.

To a large extent this problem is enabled by many large corporate entities using AM stations as syndication throw away. As I drive the highways of our nation I notice a large scale duplication of nationally syndicated programming, and lack of local programming. I find myself having to switch to Canadian stations just to find a broadcast which is local to the region, or an up to date weather forecast.

Statistically, over the past several decades the amount of locally originated programming has decreased. In my community, a station which provided 192 minutes of news per day ten years ago, now only gives us 53 minutes per day, (many of these broadcasts being multiple repeats of previous reports).

Pick your show or talk show host; I have yet to see how the plethora of syndicated sports and talk-radio serve any useful purpose other than to occupy a channel which could be used effectively by a local broadcaster to provide local community service.

The Commission should realize there is difference between the large corporate broadcaster and the small operator. A locally owned and operated radio station has an investment in a community, and a stake at the growth of the economy. Because of this, they provide public service. Most large corporate broadcasters occupy an AM channel simply to keep it from becoming someone else's station.

During the June 29, 2012 Derecho, (see page 2 for citation), many of the large corporate owned stations were oblivious to the approaching storm. As area E.A.S. Co-chairman, I heard many complaints from citizens who were taken by surprise by the storm. This was due to the fact the larger share of corporate stations, (automated, voicetracked, unmanned, and playing twelve in a row), stayed on the air during the storm's approach without a mention of the impending event.

Local television was on the air with constant coverage a <u>full</u> 120 minutes before the storm hit, and continued with coverage long after. But TV doesn't serve the mobile community. Smaller locally owned AM stations did provide coverage.

I believe a user of the public airwaves a station should have a local commitment. A good step in changing the level of commitment would be the following:

The Commission should institute a record of public service detailing times of locally originating news, weather and public service. Realizing that automation and voicetracking is a tool, (many times abused), stations should cite the time lag between recording and playback of content, as well as how many times it is repeated. At no time should a broadcaster attempt to deceive the public into thinking content is less than an hour old. This record of public service should be available for public inspection, and become a part of license renewal.

The Commission should modify the ownership rules, removing duplicating signals. I would advocate the Commission consider if nationally syndicated programming is broadcast from two or more transmitters, by the same licensee, overlapping geographic areas; if the public interest is being served.

I stop short at instituting a system like Canada uses, whereby the broadcaster must ask their version of the Commission for permission to change formats. But it is clear we have far too many AM stations on simply blanketing the nation with syndicated programs offering no local voice or value to the public.

The Commission should encourage owners who presently feed AM transmitters via satellite from locations 100 or more miles away to institute 75% local programming, and provide local public service, news, weather, and community access.

I ask the Commission to review the ownership rules and justify the need for one large corporation to own as many stations as they can, and would ask that if we can't divest signals into the hands of local ownership, the Commission would favor an ownership cap of 1 AM station covering a geographic area.

The Commission should allow, and encourage more minorities and civic organizations the opportunity to own, operate, and serve the public with AM. LPFMs are great, but there is a need for commercial radio.

The Commission should allow for applications for new AM stations by first time owners in communities which are not served by locally produced, originated media. The Commission should prohibiting larger companies, (and agents of their corporation), from applying for these stations.

In closing, the Commission should realize the errors of the past and endeavor to fix the problem. I would ask that each Commissioner read a letter²⁰ written by Texas broadcaster Paul L. Gleiser to then president of the N.A.B., Edward O. Fritts. This letter was penned November 6, 1995. And sadly, Mr. Gleiser was correct on his points on his point. Quote:

- When the gates are thrown open nationally, a handful of companies will set out to buy as many stations as they can as quickly as they can. Companies will be formed for the express purpose of either being sold or going public. And because it's just the way things work, some company will set out to be the first to own a thousand stations nationwide just for the bragging rights. A thousand stations!
- Prices for radio stations will go sky high. There will be a market "bubble" for radio stations.
- A lot of good broadcasters will succumb to the extraordinary offers and sell and quit the business.
- Radio stations that have been operated for decades by operators hoping to build successful businesses for the long term will be in the hands of people who are concerned exclusively with current-quarter results.
- The hyper-focus on short-term operating results will bring about a Draconian focus on costs. Operating expenses will be pared to the bone. Risk-taking and product development and innovation will practically cease. Dayparts that can be automated or delivered by satellite or handed over to syndication or some just-over-the-horizon technology will be so consigned. Entire radio stations will be operated with no local air staff. And not just in small markets, but in New York and Chicago and Dallas. Technology will be seen as the answer and technology will be over-exploited in the drive to eliminate living, breathing human beings that give radio its unique ability to connect on a local basis.
- Related to the point above is management. Management absorbs a disproportionate
 percentage of payroll costs so managers will be called upon to manage many more radio
 stations than they do now. Lots and lots of management jobs will disappear. The resulting
 dilution of management attention to any single radio station's operation will result in an overall
 degradation of the quality of what goes on the air and what goes on the street.
- Again related to driving down costs to make the Wall Street and investment bank-types happy,
 lots and lots and lots of radio programming jobs will be permanently eliminated, too. This will
 bring about an irrevocable talent exodus. Radio will be left with a small cadre of very highly
 paid morning shows and major market marquee' names and very little in the way of "up and

²⁰

comers" to take their places a generation from now. Radio is going to do what baseball would never do - eliminate the farm system.

- With dramatically fewer employment opportunities in the business, it will be exponentially more difficult to attract bright and talented people to the industry.
- With hundreds or maybe thousands of radio stations concentrated in the hands of just a few
 companies, there will be fewer decision makers left. In the unrelenting drive to cut costs,
 decisions to buy (or more likely not buy) a new jingle package or a great syndicated promotion
 idea will be retained at corporate and not left to the discretion of station management.
- This will serve to kill off a large number of the promotion companies, jingle companies, etc., etc.
 who serve to bring fresh ideas to the industry. It is likely that some radio companies will come
 to believe that they can vertically integrate such functions as research, promotion syndication
 or even audience measurement. The talent pool that sits and serves just outside the radio
 industry's front door will permanently shrink.
- Most chilling from your perspective, the very people I describe in the paragraphs above are the ones who attend your conventions. Who will attend when they are gone? Who will attend when corporate, once again driving down costs, refuses to let local market program directors and engineers and general managers go the Radio Show? Today there are thousands of individual decisions made as to whether or not to attend industry meetings. When one company owns hundreds maybe even a thousand radio stations, convention attendance will be a corporate decision. And I'll bet you lunch that the decision will be "no" a whole lot more often than "yes."

Mr. Fritz never wrote Mr. Gleiser back. And as you read this statement from 1995, consider how most, if not all, has come true.

Now, members of the Commission, ask yourself ... was the Telcom Act of 1996 in the best interest of the public? Who benefited from the change? Are our citizens better informed and protected from local natural disasters? Who benefits more from revenues, the corporate owner or the local community? When your family needs information, would you rather hear nationally syndicated programming or a local broadcaster providing you with news, information, and up to date weather?

I pray that we don't have disasters like we have seen where radio needs to be used. But given recent tests of our national EAS system, and the lack of public service by many stations, I think local and regional AM radio serves a great purpose for public good.

Members of the Commission, you have an opportunity to fix AM radio. You also have an opportunity to bring back localism to communities. You can bring back local voices, and restore public service. You can bring back the moral values of what it means to be a local broadcaster and serve in the public need.

I trust you will have the wisdom, and the fortitude to make the right decision to fix AM radio.

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